

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
_____	:	

**REVISED TRIAL EXHIBIT LIST OF DEFENDANT UNIVERSAL  
PROTECTION SERVICE, LP d/b/a ALLIED UNIVERSAL SECURITY SERVICES**

Defendant Universal Protection Service, LP, d/b/a Allied Universal (“Allied”) by and through undersigned counsel, files this Revised Trial Exhibit List of Defendant Universal Protection Service, LP, d/b/a Allied Universal. In an effort to streamline the presentation of evidence, Allied has withdrawn a number of its exhibits and consolidated others in a manner designed to facilitate a more organized and efficient presentation of its evidence. More specifically, in addition to the below revised Exhibit List, Allied has withdrawn the following previously identified trial exhibits: Exhibits 6, 7, 28, 35, 39, 40, 42, 43, 45, 46, 49, 50, 53, 57, 58, 59, 63, 70, 71, 73, 74, 76, 81, 91, and 95.

New Ex. No.	Previous Ex. No.	DESCRIPTION	OFFER	OBJ	DATE	
					ADMIT	N/ADM
1	67	AUS Employee Handbook - All U.S. Locations <i>[AhmedAllied000010- AhmedAllied000198]</i>			05/09/25	
2	26	AUS HEB Support Structure PowerPoint <i>[AUS 00910 - AUS 00920]</i>			05/09/25	
3	93	Use of Force Wallet Card <i>[AUS 002122 - AUS 002125]</i>				
4	3	Poster - Avoid Using Force <i>[AUS 00958]</i>				
5	80	Internal Email Communication regarding Rehire Eligibility Status <i>[AUS 01009]</i>				
6	47	AUS Job Description - Human Resources Coordinator <i>[replaced with correct version AUS 002134-002137]</i>				
7	69	AUS Human Resources Org Charts as of 10/2021 <i>[AUS 001839 - AUS 001882]</i>			05/09/25	
8	78	Ahmed's Job Application with AUS <i>[AhmedAllied000479 - AhmedAllied000480]</i>			05/09/25	
9	77	Ahmed's Contingent Job Offer with AUS <i>[AhmedAllied000477 - AhmedAllied000478]</i>			05/09/25	

10	68	AUS New Employee Orientation <i>[AUS 001615 - AUS 001802]</i>				
11	94	Video: Steve Jones Use of Force – New Employee Orientation <i>[AUS 002126]</i>				
12	18	Ahmed NEO Certificate <i>[AUS 00663]</i>				
13	19	Ahmed Training Certification - Preventing Unlawful Discrimination & Harassment <i>[AUS 00664]</i>				
14	20	Ahmed Security Professional ID Badge Receipt and Acknowledgment <i>[AUS 00665]</i>				
15	75	Ahmed's Electronically Signed Onboarding Documents <i>[AUS 00036, AUS 00554 - AUS 00595]</i>			05/09/25	
16	92	Ahmed's Compliance/Training Tracker <i>[AUS 00698-00699; AUS 002119-002121]</i>				
17	33	TDPS Criminal History Search – Ahmed <i>[AUS 00635 – AUS 00637; AUS 002107-002109]</i>				
18	36	TDPS Employee Information Update Form (Ahmed) <i>[AUS 01546]</i>			05/09/25	
19	88	Email Communications between Ahmed and Catherine Barnes in April 2022 <i>[AhmedAllied000435 - AhmedAllied000436]</i>			05/09/25	

20	41	AUS Job Description - Elite Security Professional - Armed [AUS 00629 – AUS 00631]			05/09/25	
21	5	HEB Elite Team Mandatory Training [AUS 00921]				
22	25	AUS Elite Officer PowerPoint [AUS 00940 – AUS 00955]				
23	4	TMO Pocket Training Guide HEB [AUS 00956]				
24	21	PATH Basis Course Certification Forms - Multiple Employees [AUS 00653 - AUS 00654]			05/09/25	
25	64	Photographs of Ahmed [AhmedAllied000590]; all other photographs in prior Exhibit 64 withdrawn.				
26	90	HEB SP Inspection Reports [AUS 002075-002090]				
27	62	Text Messages Between MIC Kevin and Ahmed [AhmedAllied000594 - AhmedAllied000597; supplemented with AUS 002129 - AUS 002133]				
28	61	City of Bellaire CFS - Command Log [AhmedAllied000526 - AhmedAllied000536; AhmedAllied000539 - AhmedAllied000540]			05/09/25	

29	24	738 Bellaire Market Post Orders [AUS 00643]			05/09/25	
30	29	AUS Hot Sheet - AUS Security Officer Post Orders [AUS 01036 – AUS 01042]			05/09/25	
31	27	Proof of Completion of Use of Force Wallet Card [AUS 01002]				
32	44	AUS Job Description - Field Supervisor [AUS 001817 – AUS 001820]			05/09/25	
33	65	Disciplinary Notice - 2/15/2022 [AUS 00668]				
34	66	Disciplinary Notice - 4/5/2022 [AUS 00669; AUS 00670; AUS 01055]				
35	34	AUS Incident Report 4/4/2022 (written by Ahmed) [AUS 002091-2092, AUS 00674 and AUS 00672-00673, AUS 002094]				
36	82	Email communication between Alexzander Bergeron and Wayne Oliver regarding Ahmed's termination [AUS 01065]				
37	48	AUS Job Description - Client Manager [AUS 001813 – AUS 001816]			05/09/25	
38	85	Photo of Patrick Freney [AUS 002127]				

39	23	Ahmed HEB Store Officer Training Checklist Form [AUS 00644 – AUS 00652]				
40	2	Inspection Report by Chameleon Associates [AUS 00731 - AUS 00732] <i>supplemented to add AUS 001098 – AUS 001099</i>			05/09/25 in part.	
41	55	April 5, 2022 Email and attachments from Patrick Freeney [AUS 00891- AUS 00895]				
42	60	April 6, 2022 Email and attachment from Jim Grant to Patrick Freeney [AUS 00871- AUS 00890]				
43	N/A	April 6, 2022 Email from Kareem McKinnon [AUS 00845]				
44	N/A	April 7, 2022 Email from Bill King to Patrick Freeney [AUS 00836]				
45	89	April 7, 2022 Email from Patrick Freeney to Bill King, Jim Grant and Kareem McKinnon [AUS 00842- AUS 00844 which was a portion of prior Exhibit 89]				
46	1	April 7, 2022 Email and attachments from Patrick Freeney to Felicia Solis-Ramirez [AUS 00820 - AUS 00824] Former Exhibit 1 included AUS 00824				
47	N/A	April 7, 2022 Email from Felicia Solis-Ramirez to Kareem McKinnon and copy to Patrick Freeney [AUS 00830]			05/09/25 (agreed	

					as to prior version)	
48	89	April 7, 2022 Email from Bill King to Kareem McKinnon with copy to Patrick Freeney [AUS 00825 - AUS 00826] which was a portion of prior Exhibit 89				
49	1, 52	April 7, 2022 Email and attachments from Patrick Freeney to Jim Grant [AUS 00981- AUS 00985] Former Exhibit 1 included AUS 00983				
50	N/A	April 8, 2022 Email from Jim Grant [AUS 00979- AUS 00980]				
51	54, 51	April 8, 2022 Email and attachments from Bill King to Jim Grant and Patrick Freeney [AUS 00963- AUS 00971] Former Exhibit 54 was AUS 00968-00971				
52	22	Ahmed Weapon Issue/Return Form [AhmedAllied 448-449 previously misidentified as AUS 00448- AUS 00449]				
53	32	Email communication between Freeney and Hernandez regarding PAN for Ahmed on 4/14/2022 [AUS 001078 – AUS 001082]				
54	31	PAN Form - Ahmed Termination [AUS 00700 – AUS 00703]				

55	89	June 4, 2022 Email from Patrick Freeney to Wayne Oliver [AUS 001402- AUS 001403] which was a portion of prior Exhibit 89				
56	83	Email communication between Patrick Freeney and Wayne Oliver on June 10, 2022 regarding Ahmed [AUS 01165 - AUS 01166]				
57	8	Disciplinary Matrix Guidelines [AUS 00743 - AUS 00746]			05/09/25	
58	9	Legal - Use of Force and Reporting Policy [AUS 00734 - AUS 00742]			05/09/25	
59	79	Email communication between Ahmed and Alyea in May 25/26, 2022 [AUS 01267]				
60	86	Ahmed's Unemployment Application [AUS 01272]			05/09/25	
61	84	Email Communications Regarding Ahmed's Rehire Application to AUS [AUS 01220; AUS 01269 - AUS 01270]			05/09/25	
62	30	PAN Form - Freeney Separation [AUS 001906 - AUS 001909]			05/09/25	
63	56	Hotline Complaint - Case No. 36184 [AUS 00008 – AUS 00013]			05/09/25	



64	87	Ahmed's Statement to Wayne Oliver on June 8, 2022 <i>[AUS 01332 - AUS 01334]</i>			05/09/25	
65	10	2023 Ahmed's Form 1099 <i>[AhmedAllied 000658]</i>			05/09/25	
66	11	2022 Ahmed's Form 1099 <i>[AhmedAllied 000492]</i>			05/09/25	
67	13	Ahmed's Earnings Statement with Western Eagle Security (Amerom, Inc.) <i>[AhmedAllied 000646 - AhmedAllied 000653]</i>			05/09/25	
68	14	2022 Ahmed W-2 Amerom, Inc. <i>[AhmedAllied 000654]</i>			05/09/25	
69	15	2021 Ahmed W-2 Amerom, Inc. <i>[AhmedAllied 000655]</i>			05/09/25	
70	N/A	Securitas Pay Records <i>[AhmedAllied 000820-836]</i>				
71	12,16, 17	Ahmed's Earning Statement with AUS <i>[AUS 00682 - AUS 00695]</i> <i>supplementing to add AhmedAllied 656 and AUS 00627</i>			05/09/25	
72	72	Ahmed's Job Applications for 2024 <i>[AhmedAllied000485 - AhmedAllied000487; AhmedAllied000620 - AhmedAllied000644]</i>			05/09/25	

73	37	DHS Employment Eligibility Verification Form (Ahmed) [AUS 01558 – AUS 01561 and AUS 002101]			05/09/25	
74	38	Permanent Resident Card (Ahmed) [AUS 01562 – AUS 01563]			05/09/25	

Date: August 10, 2025

**MARTENSON, HASBROUCK & SIMON LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 2025, I caused to be filed a true and correct copy of the foregoing document using the Court's CM/ECF system that will serve notice and a copy on all counsel of record as follows:

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